

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., <i>et al.</i> ¹)	Case No. 25-10068 (CTG)
)	
)	(Jointly Administered)
Debtors.)	
)	Related Dkt. No. 303, 338

**CERTIFICATE OF NO OBJECTION REGARDING ORDER AUTHORIZING THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO FILE UNDER SEAL
EXHIBIT D OF ITS OMNIBUS OBJECTION TO DEBTORS' MOTIONS (I) FOR
ENTRY OF AN ORDER APPROVING BIDDING PROCEDURES AND STALKING
HORSE AGREEMENT; AND (II) FOR ENTRY OF A FINAL ORDER AUTHORIZING
THE USE OF CASH COLLATERAL**

The undersigned counsel for the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned Debtors under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), hereby certifies that:

1. On February 12, 2025, the Committee filed the *Motion for an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal Exhibit D of its Omnibus Objection to Debtors' Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral* [Docket No. 398] (the “Motion”).

¹ The Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

2. Pursuant to the Notice filed with the Motion, objections to entry of an order granting the Motion were due at the hearing held on February 14, 2025 at 9:30 a.m. (ET) (“the “Hearing”).

3. The undersigned has caused the Court’s docket in this case to be reviewed, and no answer, objection or other responsive pleadings to the Motion appears thereon. Additionally, no objections to the Motion have been received by the undersigned counsel nor received at the Hearing.

Accordingly, the Committee respectfully requests that the proposed order attached as **Exhibit A** to the Motion be entered at the Court’s earliest convenience.

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Dated: February 27, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ James E. O'Neill

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*Proposed Co-Counsel to the Official Committee
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